



301334

**CONESTOGA-ROVERS
& ASSOCIATES**8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/lg/113 DATE: August 31, 2007

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Status Report # 22 for the Resource Recovery Group/Clayton Chemical Company Site

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated Federal On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twenty-second Monthly Status Report is July 23, 2007, through August 24, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 21 was submitted to U.S. EPA on July 31, 2007.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities performed during the reporting period were primarily related to the preparation of a response to the comments made by OSC Kevin Turner regarding the proposed profile of the landfill cap, which The Respondents may install at the Site, and the submission of Status Report # 21. No field activity was performed during the reporting period. Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report.

A weekly summary of activities appears below:

- During the week of July 23, 2007 (July 23 - July 27, 2007), the primary activities that were performed centered on the development of a response to OSC Turner's June 27, 2007 electronic mail (e-mail) message and the development of Status Report # 21. No Site visits were initiated during the week of June 25, 2007;
- The key activity completed during the week of July 30, 2007 involved the submission of the required project progress report (Status Report # 21) and the continued development of the response to OSC Turner's conceptual cap design e-mail. No Site visits were initiated during the week of July 2, 2007;
- For the week of August 6, 2007, the primary focus of Site-related activities was the continued development of the response to OSC Turner's June 27, 2007 cap profile e-mail;
- The submission of the response to OSC Turner's June 27, 2007 conceptual cap design e-mail was the key activity for the week of August 13, 2007. On August 13, 2007, The Respondents provided OSC Turner with a hydraulic conductivity comparison and references to other U.S. EPA Region V Sites that had installed similarly designed landfill cover systems with U.S. EPA approval in response to his comments on the proposed conceptual cap design; and
- The review and assembly of the various documents generated during the completion of the completed Site activities was the focus of Site related actions performed during the week of August 20, 2007. No Site visits were scheduled or completed during the week.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A - Weekly Summary of Site Activities for July 23 -27, 2007; Appendix B - Weekly Summary of Site Activities for July 30 - August 3, 2007; Appendix C - Weekly Summary of Site Activities for August 6 - 10, 2007; Appendix D - Weekly Summary of Site Activities for August 13 - 17, 2007; and Appendix E - Weekly Summary of Site Activities for August 20 - 24, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by The Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

No samples were collected during the reporting period. Also, no analytical data from previously collected samples were received during the reporting period.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in

Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

No significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, no analytical data were received during the reporting period.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (July 23, 2007, through August 24, 2007), the following activities are anticipated:

- Oversight of the second round of groundwater sampling from the Sauget Area 2 well cluster located along the western Site boundary;
- Removal for the remaining wood waste roll off container will/may be scheduled;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and
- Site restoration activities, as needed, will be completed.

4.2 SAMPLING AND ANALYSIS

The Sauget Area 2 Group has requested and received Site access approval to collect a second round of groundwater samples from the RRG/Clayton Site during the upcoming report period. Once a mutually convenient date has been determined, URS personnel will collect samples from the 3 groundwater monitoring wells that were installed along the western boundary of the Site in June 2006. CRA will provide oversight of this sampling event on behalf of The Respondents, as well as collect sample splits.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the removal of wood waste from the Site for disposal at the Milam Landfill facility in East St. Louis, Illinois and limited Site restoration activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Continue Stormwater Control Measures	As needed/ongoing	August 27, 2007
Continue Technical Design and Construction Scheduling of Profile of the Landfill Cap	Ongoing/30 days	August 27, 2007
Initiate Wood Waste Removal Activities	Ongoing/30 days	August 27, 2007
Initiate Site Restoration Activities	Ongoing/30 days	August 27, 2007
Submit Status Report # 23	1 day	October 1, 2007

Attachments

FIGURE 1

SITE MAP

APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 23 -27, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/108 DATE: August 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For July 23 - 27, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-sixth week (the period July 23 through July 27, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail
July 24, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 24, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 25, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 26, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

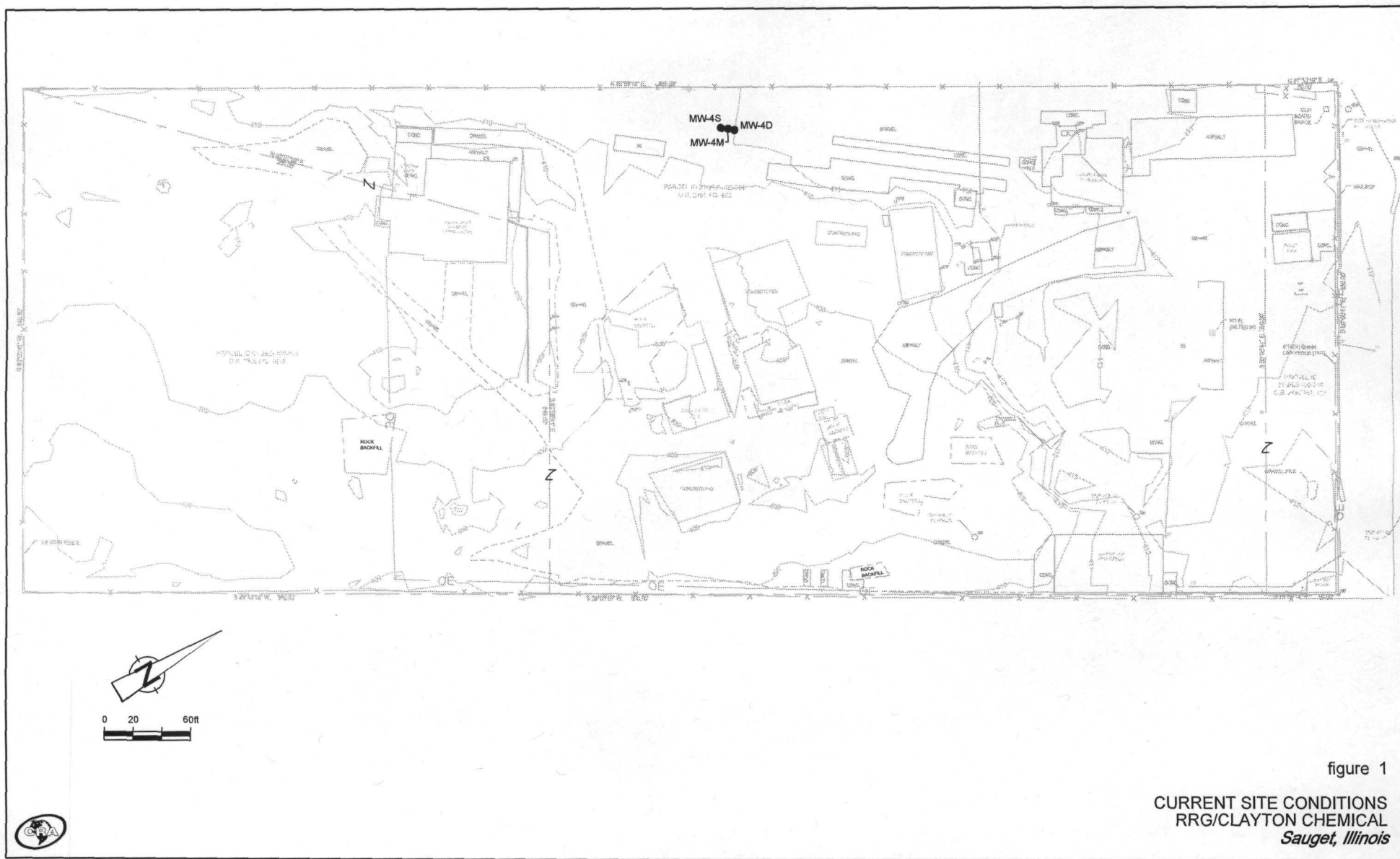


figure 1
CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 30 - AUGUST 3, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/109 DATE: August 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For July 30 – August 3, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-seventh week (the period July 30 through August 3, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail. Also, The Respondents prepared Status Report # 21 for submission to the U.S. EPA

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 31, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted the required project progress report (Status Report # 21)
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail. The Respondents completed Status Report # 21 and submitted it to the U.S. EPA
August 1, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
August 2, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 2, 2007	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
August 3, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

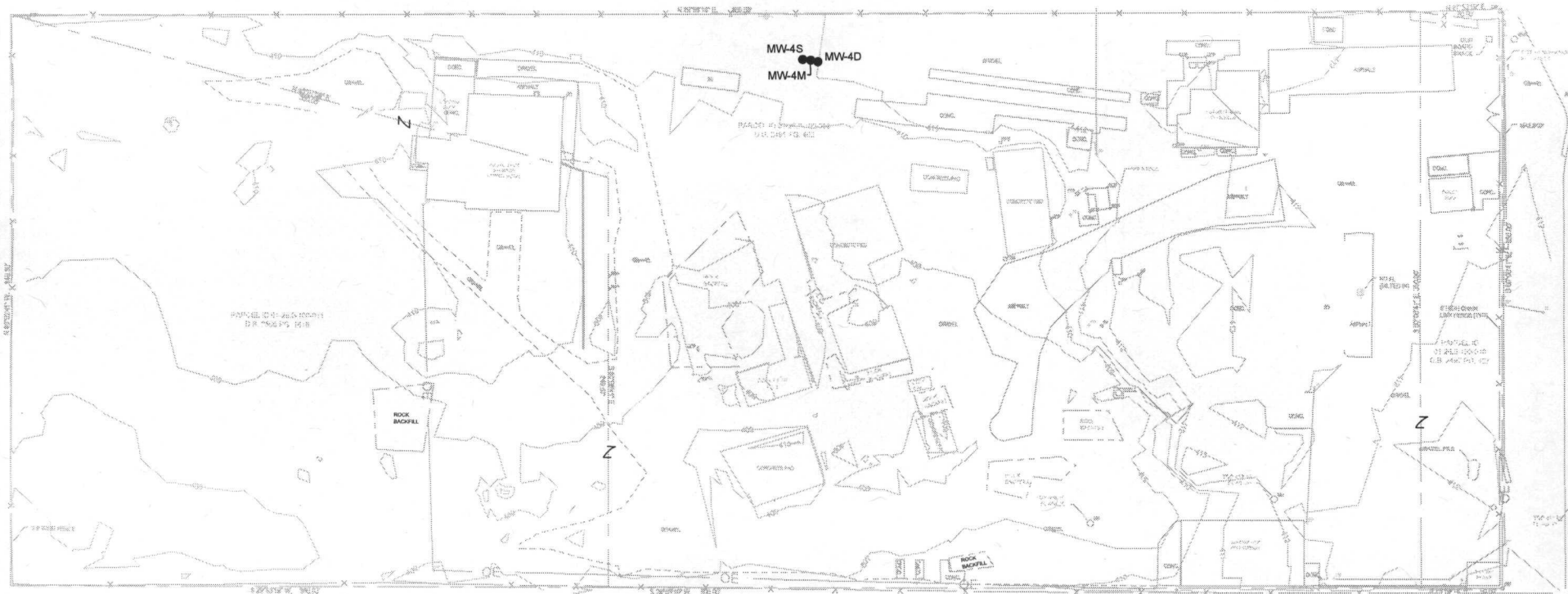


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 6 – 10, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/110 DATE: August 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For August 6 -10, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-ninth week (the period August 6 through 10, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 6, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail
August 7, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 7, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
August 8, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
August 9, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 9, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
August 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

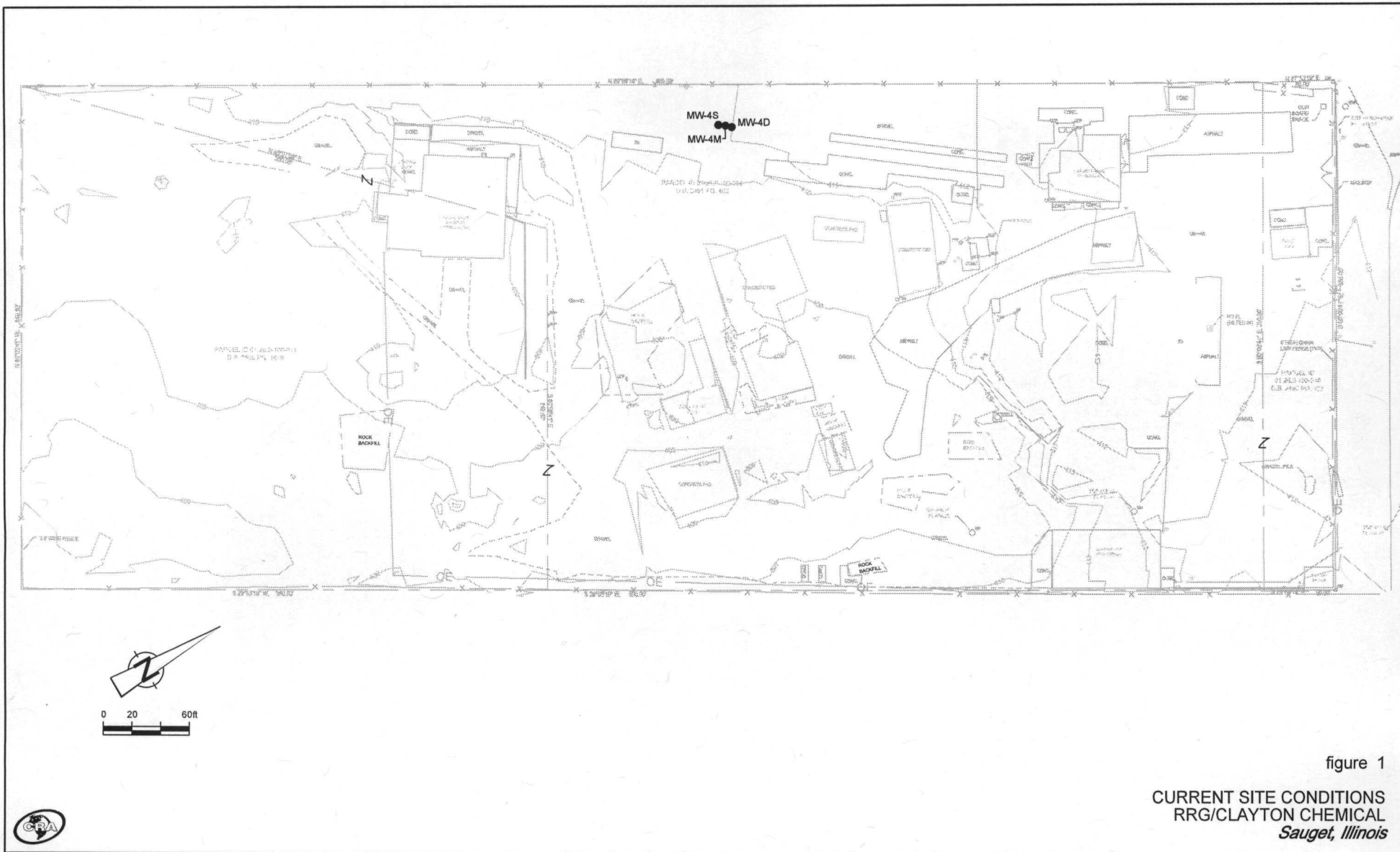


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 13 - 17, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee

REF. NO.: 042192-03

FROM: Garth Daley/lg/111

DATE: August 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For August 13 -17, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninetieth week (the period August 13 through 17, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 13, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted the response to OSC Turner's June 27, 2007 conceptual cap design e-mail
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 13, 2007	Miscellaneous	The Respondents completed the response to OSC Turner's June 27, 2006 cap profile e-mail and submitted it to the U.S. EPA
August 14, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 15, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 16, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

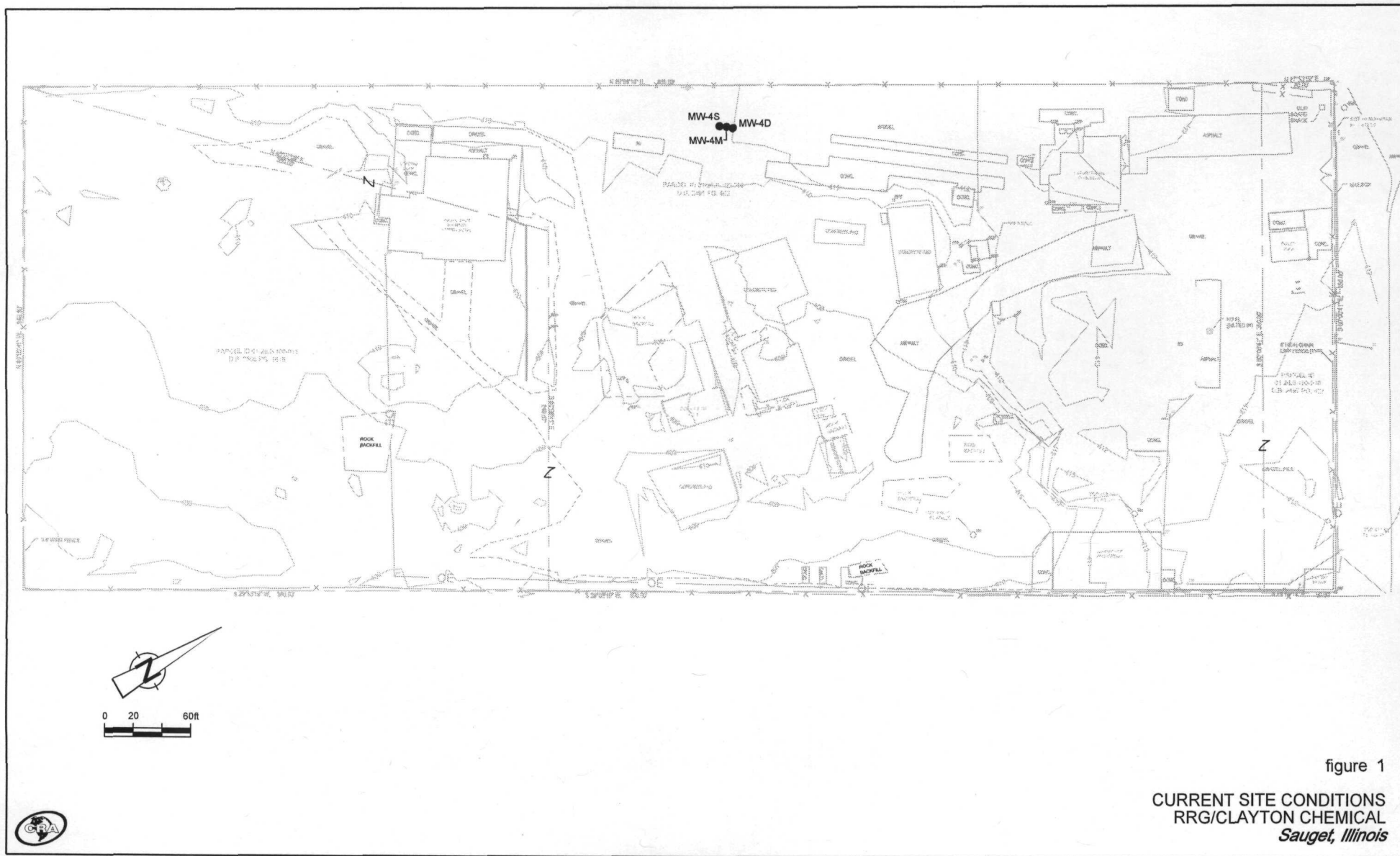


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 20 - 24, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee

REF. NO.: 042192-03

FROM: Garth Daley/lg/112

DATE: August 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For August 20 -24, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninety-first week (the period August 20 through 24, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 21, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 21, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 22, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 23, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None
August 24, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	None

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

